UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

14 CV 9249

MADELINE NELSON,

Plaintiff,

-v-

THE CITY OF NEW YORK and NEW YORK CITY POLICE DEPARTMENT ("NYPD") OFFICER CRISTIAN CHANG, SHIELD NO. 940985,

Defendants.

COMPLAINT AND DEMAND FOR JURY TRIAL

Index No.

JUDGE PAULEY

ECF CASE

RECEIVED NOV 20 2014 USDC SDNY

Plaintiff MADELINE NELSON, by her counsel, GIDEON ORION OLIVER, as and for her Complaint against Defendants, hereby alleges as follows:

PRELIMINARY STATEMENT

1. Plaintiff brings this action for compensatory damages, punitive damages and attorney's fees pursuant to 42 U.S.C. §1983 and 42 U.S.C. § 1988 for violations of her civil rights, as secured by said statutes and the Constitution of the United States and the Constitution and laws of the State of New York.

2. On November 20, 2011, Ms. Nelson was lawfully engaging in expressive conduct protected by the First Amendment to the United States Constitution and Article I, Section 8 of the New York State Constitution, when, without lawful authority or justification, and acting pursuant to the unlawful policies, practices, and customs complained of elsewhere herein, Defendant CRISTIAN CHANG unlawfully arrested Ms. Nelson.

3. Specifically, Ms. Nelson had been protesting with others across the street from then-New York City Mayor Michael Bloomberg's private townhouse on the Upper East Side of Manhattan by banging on a metal pot with a spoon in a protest associated with Occupy Wall Street ("OWS").

November 20, 2014

Respectfully submitted,

Gideon Orion Oliver
Attorney for Plaintiff
277 Broadway, Suite 1501
New York, NY 10007
t: 646-263-3495